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 FEDERAL ENERGY
 REGULATORY
 COMMISSION

UNITED STATES OF AMERICA
 BEFORE THE
 FEDERAL ENERGY REGULATORY COMMISSION

ORIGINAL

PJM Interconnection, L.L.C., *et al.*)
 Allegheny Power)
 Avista Corporation, *et al.*)
 Avista Corporation, *et al.*)
 Arizona Public Service Co., *et al.*)
 GridFlorida LLC)
 Carolina Power & Light Co., *et al.*)
 Entergy Services, Inc.)
 Southern Company Services, Inc.)

Docket No. RT01-2-000*
 Docket No. RT01-10-000*
 Docket No. RT01-15-000*
 Docket No. RT01-35-000*
 Docket No. RT01-44-000*
 Docket No. RT01-67-000*
 Docket No. RT01-74-000*
 Docket No. RT01-75-000*
 Docket No. RT01-77-000*
 *Not Consolidated

**MOTION TO INTERVENE OF THE
NATIONAL RURAL ELECTRIC COOPERATIVE ASSOCIATION**

Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.214), National Rural Electric Cooperative Association ("NRECA") moves to intervene in the above-captioned unconsolidated dockets. In support of its motion to intervene, the NRECA states as follows:

I. SERVICE AND COMMUNICATIONS

Service in this proceeding should be made upon and communications directed to the following persons:

Wallace F. Tillman, General Counsel
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II. DESCRIPTION OF NRECA

NRECA is a not-for-profit trade association comprised of approximately 935 rural electric cooperatives. More than 800 of these cooperatives are distribution cooperatives that provide retail electric service to over thirty-two million consumer-owners in forty-six states. Kilowatt-hour sales by rural electric cooperatives account for approximately 9 percent of total retail electricity sales in the United States. In addition, NRECA members include approximately sixty generation and transmission cooperatives supplying wholesale power to their owner-members.

III. MOTION TO INTERVENE

The above-captioned proceedings are each Regional Transmission Organization ("RTO") related filings submitted by FERC-jurisdictional owners of transmission facilities, as required by the provisions of Order No. 2000.¹

NRECA, as a trade association comprised of rural electric cooperatives, many of whom will be transmission customers of RTOs, transmission-owning members of RTOs, or both, will be substantially affected by the outcome of these RTO proceedings. NRECA has an interest in the above-captioned proceedings that cannot be represented by any other party. NRECA's intervention in the above-captioned proceedings is therefore in the public interest.

¹ *Regional Transmission Organizations*, 65 Fed. Reg. 809 (January 6, 2000), FERC Stats. and Regs. ¶ 31,089 (1999), *order on reh'g*, Order No. 2000-A, 65 Fed. Reg. 12,088 (March 8, 2000), FERC Stats. and Regs. ¶ 31,092 (2000), *appeal pend'g sub nom. Public Utility District No. 1 of Snohomish County v. Federal Energy Regulatory Commission*, Nos. 00-1174, *et al.* (D.C. Cir. 2000).

IV. CONCLUSION

WHEREFORE, NRECA requests the Commission to permit it to intervene in the above-captioned unconsolidated dockets.

Respectfully submitted,

NATIONAL RURAL ELECTRIC COOPERATIVE
ASSOCIATION

By Helen S. Shepherd

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November 17, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this 17th day of November, 2000, served the foregoing document upon all parties shown on the Commission's official service lists in the above-captioned unconsolidated proceedings by depositing copies in the United States mail, first class postage prepaid.

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